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DEC 17 1985

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SOLID WASTE BRANCH
U.S. EPA, REGION V

Transmission and Chassis Division
Ford Motor Company

Sterling Plant
39000 Mound Road
Sterling Heights, Michigan 48078

DEC 17 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

November 26, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Subject: Information Request
Loss of Interim Status
Ford Sterling Plant
EPA ID No MID 044255420

150 PA
DEC 17 1985

Dear Mr. Constantelos:

This is in response to your request for information received by the subject plant on November 7, 1985 concerning RCRA land disposal units that may be subject to the loss of interim status provisions of the Hazardous and Solid Waste Amendments of 1984. You indicate, (page 2), that this facility is:

" . . . required pursuant to the authority of Section 3007 of RCRA, 42 U.S.C. Section 6927, to report to the U.S. EPA information regarding hazardous waste land disposal units that had interim status on or before November 8, 1985, and/or received hazardous waste after November 19, 1980."

Please be advised that the Ford Motor Company Sterling Plant had no land disposal unit that either had interim status on or before November 8, 1985 or received hazardous waste after November 19, 1980.

Please note that two wastewater treatment lagoons which EPA has conceded received no material after November 19, 1980 are nevertheless the subject of an administrative dispute (Index RCRA V-W-84-R-077). Your enforcement counsel in that proceeding is Mr. Rodger C. Field, Assistant Regional Counsel. A copy of this response is being sent to Mr. Field.

Without waving any position taken by Ford in that proceeding and without prejudice to Ford's position that the response to your inquiry letter is entirely in the negative, we provide the following information for background purposes only:

Information Request

1. Identify each RCRA land disposal unit at your facility by stating the common name or identifier used by the facility and Part A process code. Identify the unit on a photocopy of a topographic map attached to your response.

Response:

At present, there are no active RCRA land disposal units at the Ford Sterling Plant. There are two inactive surface impoundments not operated since prior to November 19, 1980 that are not considered RCRA Sites. They are identified as the Northeast and Northwest surface impoundments. See attached facility map.

2. Identify each RCRA land disposal unit at your facility which was not within the scope of a certification of compliance with all applicable groundwater monitoring and financial responsibility requirements and a Part B permit application, transmitted to EPA by November 8, 1985, by indicating for each common name or identifier used by the facility and Part A process code, which unit must be identified on the topographic map in response to information request number 1 above.

Response:

All surface impoundments identified in request #1 stopped accepting waste by November 19, 1980. No Part B Permit application or Interim Status certification were required.

3. For each RCRA land disposal unit at your facility which was not within the scope of a certification of compliance with all applicable groundwater monitoring and financial responsibility requirements and a Part B permit transmitted to EPA by November 8, 1985, state when and to whom a closure plan was submitted.

Response:

Closure plans for the Northeast and Northwest surface impoundments identified in request #1 were submitted to EPA Region V on April 12, 1985 as last amended on August 9, 1985 and approved by EPA on September 30, 1985.

4. For each RCRA land disposal unit at your facility which was not the scope of a certification of compliance with all applicable groundwater monitoring and financial responsibility requirements and a Part B permit application transmitted to EPA by November 8, 1985:
 - a. State the type and average quantity of hazardous waste placed in each on a daily (or monthly) average during the year prior to November 8, 1985.
 - b. State when the unit ceased receiving hazardous waste.
 - c. State whether hazardous waste was placed in the unit between November 8, 1985 and December 31, 1985.

Response (a. b. & c.):

No waste was placed in the Northeast or Northwest surface impoundments between November 8, 1985 and December 31, 1985 inasmuch as these two surface impoundments stopped receiving waste before November 1980.

- d. State whether hazardous waste introduced into the unit before November 8, 1985 has been treated, stored, or disposed of between November 8, 1985 and December 31, 1985.

Response:

All waste formerly introduced into the waste treatment units identified in request #1 is being removed according to the closure plan. The waste is being disposed of off-site at an EPA approved facility.

- e. State how you intend to treat, store, or dispose of that hazardous waste identified in "d", in 1986, including the identity of any off-site facility to which you intend to ship it.

Response:

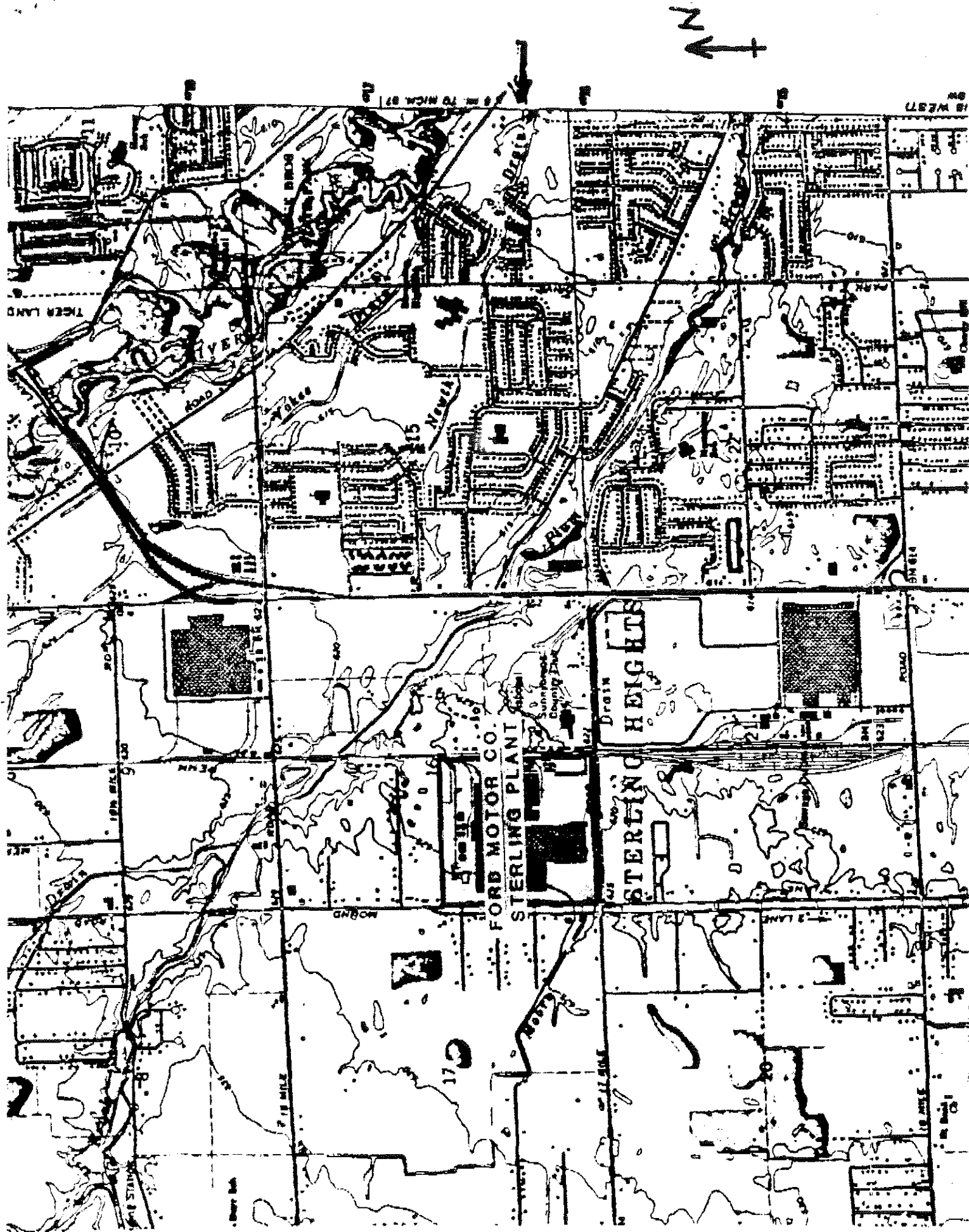
Consistent with the closure plan, all waste to be removed from the inactive Northeast and Northwest surface impoundments in 1986 is to be disposed of off-site at the Wayne Disposal, Inc. (MID 048090633) landfill.

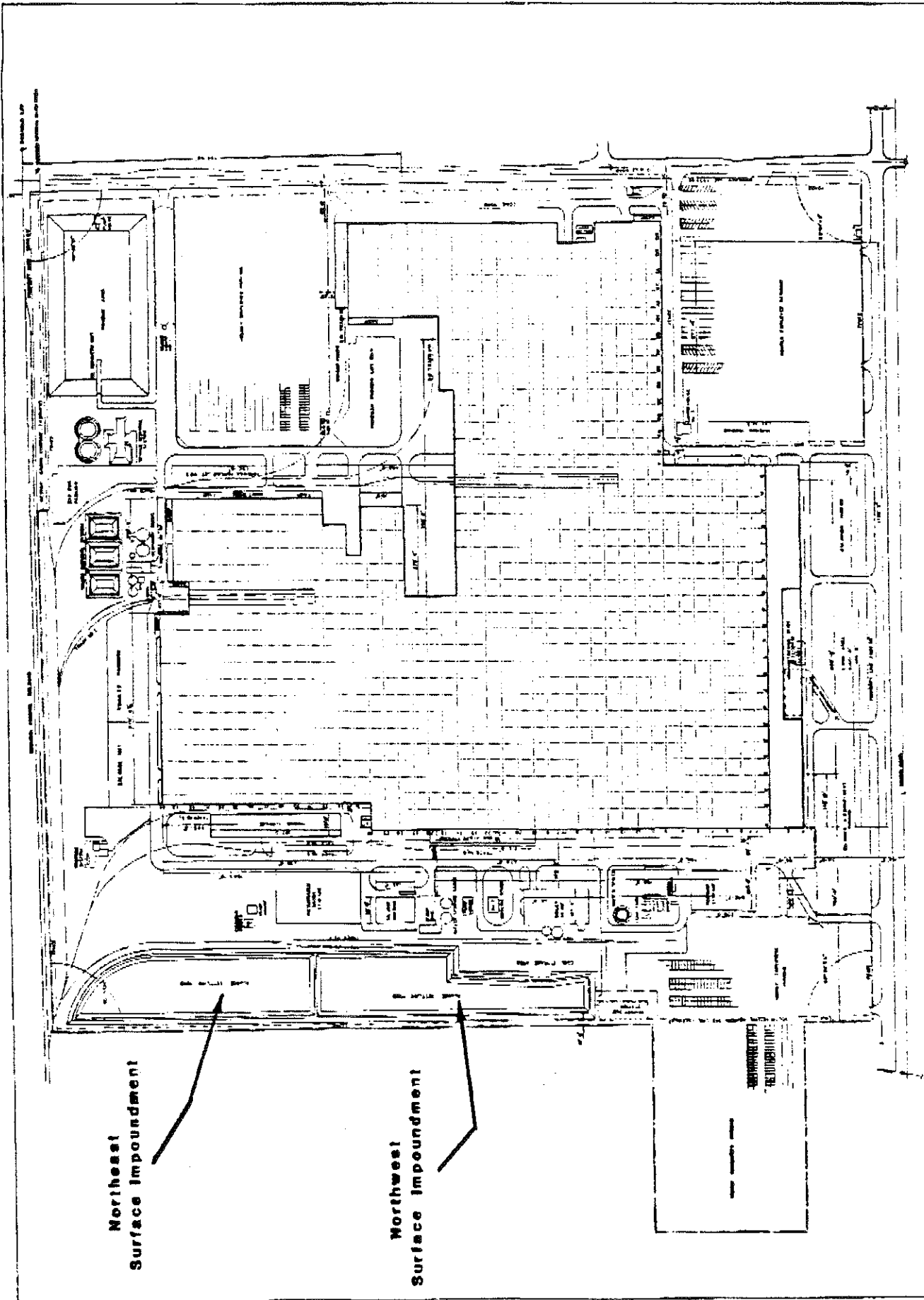
Inasmuch as the above responses fully answer all four questions contained in the information request, and since all units are implementing closure activities, no further reporting is indicated. Questions, if any, may be addressed to Mr. J. S. Amber of the Ford Stationary Source Environmental Control Office on (313) 322-4646.



K. W. Watler
Plant Manager
Sterling Plant

cc: Rodger C. Field, Esq
Asst. Regional Counsel
U.S. EPA
Region V
230 South Dearborn Street
Room 1646
Chicago, Illinois 60604





PLOT FLOOR			
STERLING PLANT			
DATE	BY	CHKD	APP'D
10/1/54	J. H. HARRIS	J. H. HARRIS	J. H. HARRIS

SEE PLOT FLOOR FOR DETAILS



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Response:

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2. Identify each RCRA land disposal unit at your facility which was not within the scope of a certification of compliance with all applicable groundwater monitoring and financial responsibility requirements and a Part B permit application, transmitted to EPA by November 8, 1985, by indicating for each common name or identifier used by the facility and Part A process code, which unit must be identified on the topographic map in response to information request number 1 above.

Response:

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Response:

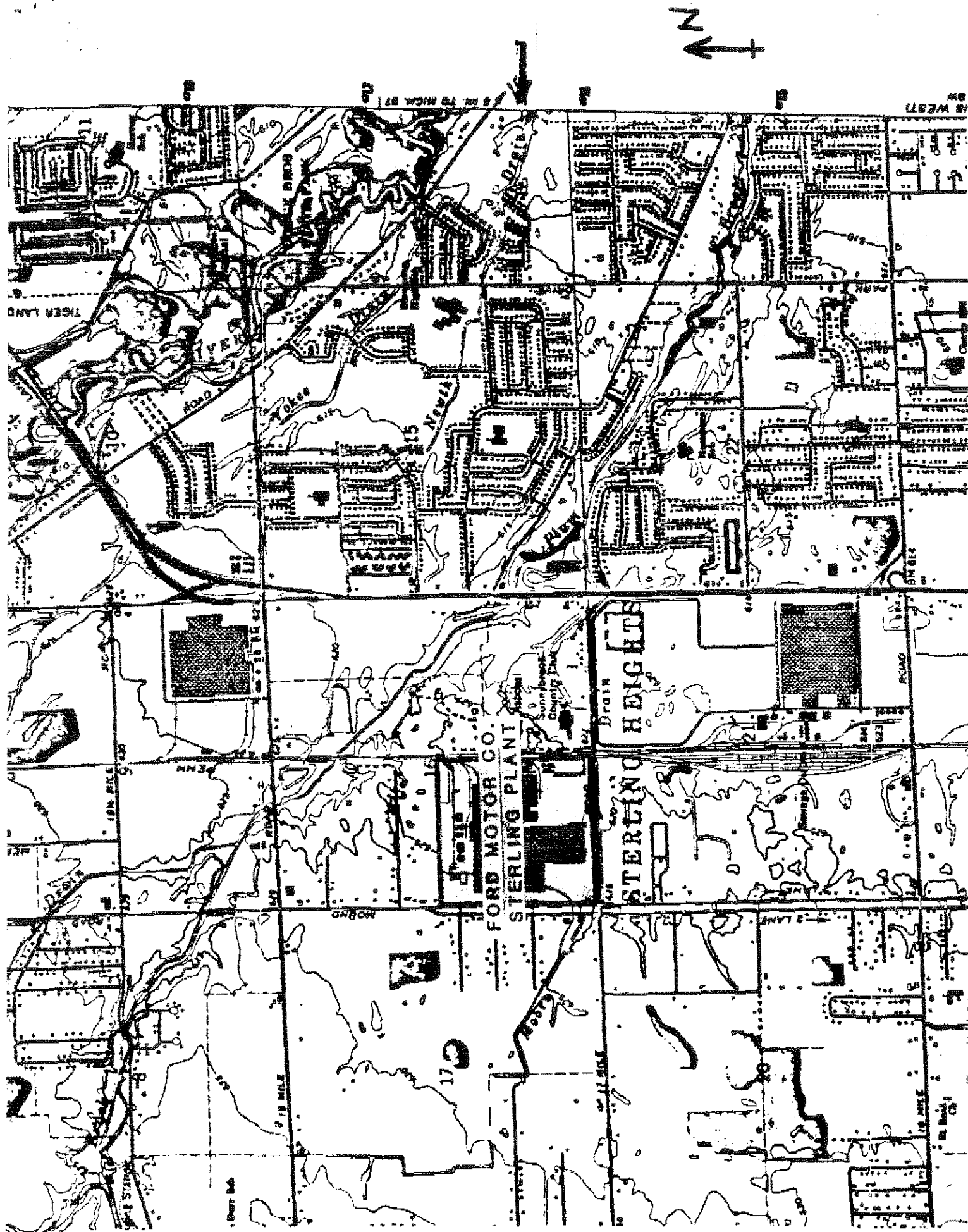
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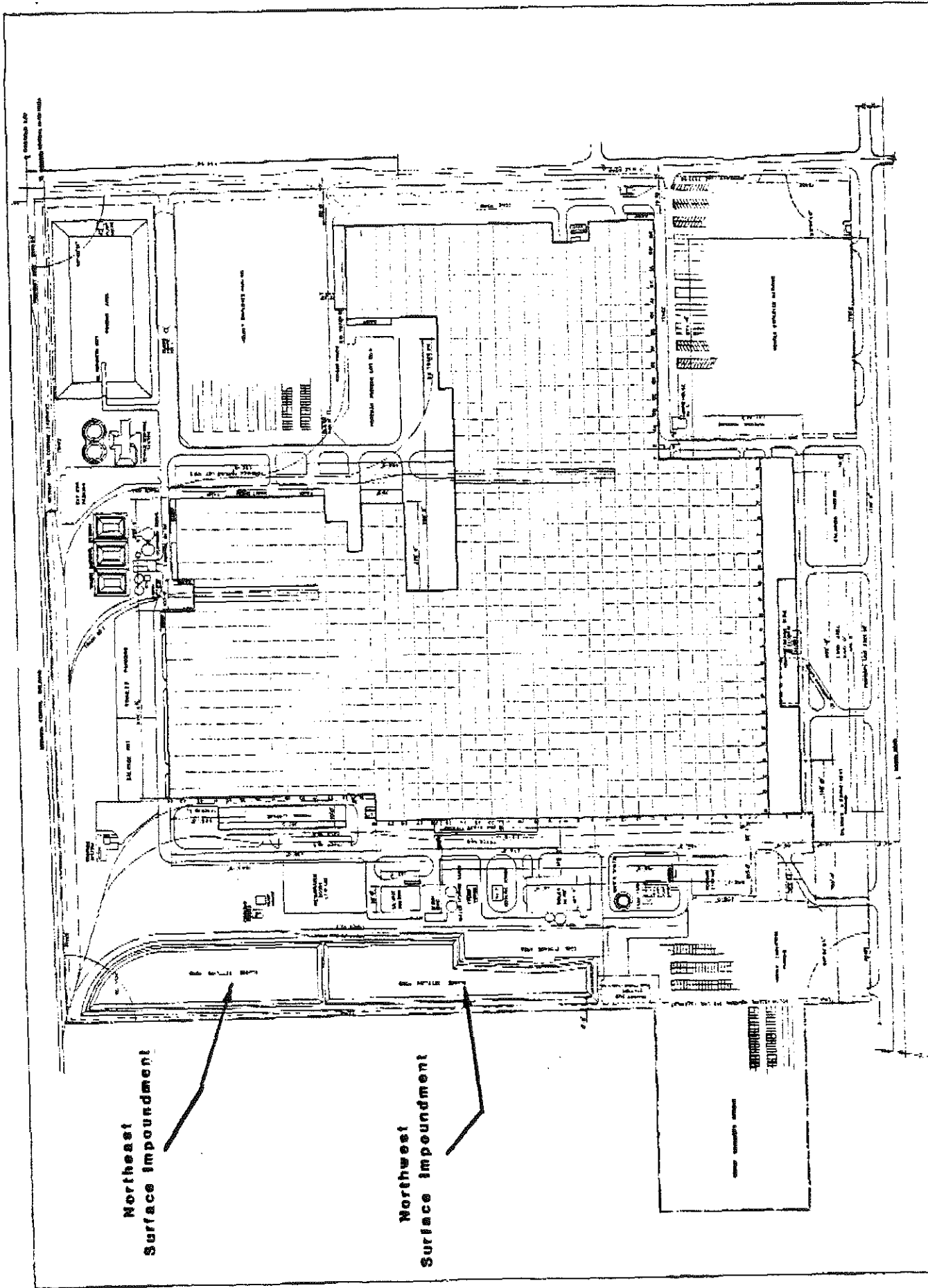
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Plant Manager
Sterling Plant

cc: Rodger C. Field, Esq
Asst. Regional Counsel
U.S. EPA
Region V
230 South Dearborn Street
Room 1646
Chicago, Illinois 60604





Northeast
Surface Improvement

Northwest
Surface Improvement



PLOT PLAN	
STEERING PLAN	
DATE	10-1-57
BY	J. H. HARRIS
FOR	STEERING PLAN
SCALE	1" = 100'

ALL DIMENSIONS ARE IN FEET



Sterling Plant
9000 Mould Road
Sterling Heights, Michigan 48078

HP

RECEIPT DESIRED	
CERTIFIED	
NO.	12677



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